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Attorneys for Plaintiff
Switch, Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SWITCH, LTD.,
a Nevada limited liability company,

Plaintiff,

vs.

STEPHEN FAIRFAX; MTECHNOLOGY;
DOES 1 through 10; and ROE ENTITIES 11
through 20, inclusive,

Defendants.

Case No.: 2:17-cv-02651-GMN-EJY

JOINT MOTION REGARDING
[PROPOSED] STIPULATED
PROTECTIVE ORDER

1 Plaintiff Switch, Ltd. (“Switch”) and Defendants Stephen Fairfax and MTechnology
 2 (“MTech”), through counsel, hereby jointly move that the Court approve and execute the [Proposed]
 3 Stipulated Protective Order attached to this Joint Motion as **Exhibit 1**.

4 When the parties began negotiating the language of a Stipulated Protective Order in July of
 5 2019, they were unable to agree on a few key provisions of the Stipulated Protective Order. This
 6 caused Defendants to file with the Court a Request for Pretrial Conference and Submission of
 7 Proposed Protective Order (Doc. # 48) on September 3, 2019. Defendants attached their proposed
 8 Protective Order as Exhibit A to their Request.

9 On September 17, 2019, Plaintiff filed its Response to Defendants’ Request for Pretrial
 10 Conference and Submission of Proposed Protective Order (Doc. # 52). Plaintiff attached its proposed
 11 Protective Order as Exhibit 7 to its Response. On September 24, 2019, Defendants filed their Reply
 12 in Support of Defendants’ Request for Pretrial Conference and Submission of proposed Protective
 13 Order (Doc. # 53).

14 After Defendants’ Request was fully briefed, the parties continued to discuss the contents of
 15 the proposed Protective Order and subsequently agreed upon mutually acceptable language. The
 16 parties have attached their mutually agreed proposed Stipulated Protective Order as Exhibit 1 to this
 17 Joint Motion. The parties request that the Court approve and execute the attached proposed Order at
 18 its earliest convenience. The parties additionally agree that Defendants’ Request for Pretrial
 19 Conference has been rendered moot by this Joint Motion.

20 Dated: November 18, 2019. Respectfully submitted,

21 /s/ Ronald D. Green

22 Ronald D. Green (NV Bar No. 7360)

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Attorneys for Plaintiff

Switch, Ltd.

Case No. 2:17-cv-02651-GMN-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 18, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

/s/ Crystal Sabala

Employee,

Randazza Legal Group, PLLC